

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

CARMELO TREVISO, Individually and  
on Behalf of All Others Similarly Situated,

Plaintiffs,

vs.

NATIONAL FOOTBALL LEAGUE, et al.,

Defendants.

CASE NO. 5:17-CV-00472

JUDGE CHRISTOPHER A. BOYKO

**DEFENDANT NATIONAL FOOTBALL MUSEUM, INC. dba PRO  
FOOTBALL HALL OF FAME’S MOTION FOR LEAVE TO FILE  
SUPPLEMENTAL MEMORANDUM IN OPPOSITION TO PLAINTIFF’S  
RENEWED MOTION FOR CLASS CERTIFICATION AND  
APPOINTMENT OF CLASS COUNSEL, *INSTANTER***

Defendant, National Football Museum, Inc. dba Pro Football Hall of Fame (“Defendant”), hereby provides notice of its filing of this Motion for Leave to File Supplemental Memorandum in Opposition to Plaintiff’s Motion for Class Certification and Appointment of Class Counsel, *Instanter*.

For cause, Defendant respectfully seeks leave to file a supplemental memorandum, *instanter*, due to new and pertinent evidence that was recently discovered on or around March 25, 2019. More specifically, Defendant must supplement its memorandum in opposition to present to

the Court new evidence pertaining to the inadequacy and potential legal and financial burdens of Plaintiff's proposed class counsel, Eagan Avenatti, LLP and Attorney Michael Avenatti. For further support and explanation, a memorandum in support is attached hereto and incorporated herein.

Respectfully submitted,

/s/ Scott M. Zurakowski

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FOOTBALL HALL OF FAME

**CERTIFICATE OF SERVICE**

I hereby certify that on the 3rd day of April 2019, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

*/s/ Scott M. Zurakowski*

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Scott M. Zurakowski (0069040)

KRUGLIAK, WILKINS, GRIFFITHS

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